

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 05-0991 (JGP)
	)	
WILLIAM P. TEDARDS, JR.	)	
YVONNE TEDARDS,	)	
	)	
Defendants.	)	
_____	)	

PLAINTIFF'S CONSENT MOTION FOR ENLARGEMENT OF TIME

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Plaintiff, United States of America, requests an enlargement of time, up to and including June 20, 2006, to file a dispositive motion. The parties have twice moved jointly for an enlargement of time for this purpose. Pursuant to LCvR 7.1(m), undersigned counsel conferred with *pro se* Defendants, who provided their consent.

For cause, Plaintiff states as follows:

1. By Order dated March 1, 2006 [#21], the Court adopted the parties' proposed schedule for completing discovery and filing dispositive motions. Under the terms of that Order, the discovery period was extended to March 28, 2006 for the limited purpose of completing the depositions of both Defendants.
2. Although those depositions were conducted on the dates prescribed in the Court's Order, one of the depositions had to be continued to obtain additional discovery regarding Defendants' counterclaim which Defendants' claimed was not presently available. The continued deposition occurred on Thursday, April 27, 2006.

3. Because of this delay in obtaining discovery, Plaintiff's dispositive motion could not be prepared in time to meet the present May 5, 2006 due date.

4. To allow time to obtain the deposition transcripts and prepare a dispositive motion, Plaintiff requests that the due date for its dispositive motion be extended to June 20, 2006.

For the foregoing reasons, Plaintiff respectfully requests that its motion for an enlargement of time be granted.¹

Dated: May 5, 2006.

Respectfully submitted,

_____/s/_____
KENNETH L. WAINSTEIN, D.C. BAR #451058
United States Attorney

_____/s/_____
RUDOLPH CONTRERAS, DC BAR #434122
Assistant United States Attorney

_____/s/_____
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¹Pursuant to the Court's Local Rule 7.1(c), a proposed order consistent with this motion is attached herewith.